



PROGRESS REPORT NO. 177

TO: Robert Tan, U.S. Environmental Protection Agency (EPA) – via Electronic mail
Bonnie Arthur, EPA – via Electronic mail

FROM: Denise Mills, Teck American Incorporated (TAI)

Cc: Kris McCaig, TAI – via Electronic mail
Rob Orr, TAI – via Electronic mail

DATE: April 12, 2021

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) – Progress Report No. 177 Month Ending March 2021

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES):

The third-party data validator completed validation of the analytical results for the portion of Phase II bench-scale testing time point 3 (t3) test pot soil samples, collected on March 11, 2020, that were reanalyzed by The Ohio State University in February 2021. OSU recommended reanalysis of some t3 samples to confirm the initial results for *in vitro* bioaccessibility for lead in some of the test pots. As of this writing, TAI expects to receive the electronic data deliverable (EDD) for Phase II in early April 2021. TAI is preparing the draft Phase II Data Summary Report (DSR) and a separate statistical analysis report that will evaluate the bench-scale testing and effects of the soil treatments tested in the lab.

Planning continued during the month for the continued Phase III amendment application to the SATES test plots and the initial Phase IV soil sampling event which will be completed in April and May 2021, respectively, as documented in the EPA-approved Work Plan Change Request No. 2. TAI provided a project update during a call with EPA and the SATES Technical Team on March 19, 2021. TAI provided the draft Application Placement Quality Plan (APQP) for review and

comment on March 10, 2021, and received comments from the Citizens for a Clean Columbia (CCC) on March 15, 2021. TAI distributed a revised APQP for review and comment, with a response to CCC's comments on March 30, 2021. As of this writing, TAI received via email additional comments from CCC and will provide responses to these comments in early April.

Baseline Ecological Risk Assessment (BERA) – TAI continued working on the pre-draft terrestrial BERA (the Interim Partial Upland BERA), for submittal to EPA in June 2021. This pre-draft BERA will be revised based on EPA input and incorporated into the Draft Site-wide BERA at a later date.

Remedial Investigation (RI) Report – TAI continued working on the pre-draft RI Report focused on the UCR upland areas (the Interim Partial Upland RI), for submittal to EPA in July 2021. This pre-draft RI will be revised based on EPA input and incorporated into the draft Site-wide RI at a later date. TAI received a request from EPA via email on March 25, 2021 for an outline for the RI; TAI will provide the requested outline to EPA in early April.

2019 Phase 3 Sediment Study:

2019 Phase 3 Sediment Study DSR – TAI submitted the draft DSR to EPA for review and comment on December 23, 2020. TAI received comments from EPA on the draft DSR on March 2, 2021. As of this writing, TAI submitted responses to EPA's March 2, 2021 comments and a draft final 2019 Phase 3 Sediment Study DSR to EPA for review and approval on April 1, 2021.

Bioassay Testing – In addition to data previously provided by EPA, via the U.S. Geological Survey Columbia Environmental Research Center (CERC), for the Phase 3 bioassay split sample program, CERC provided total recoverable metals data to EPA and TAI on January 8, 2021 and provided total organic carbon (TOC) data from the bioassay split samples on February 2, 2021. Following a call between EPA and TAI on December 17, 2020 regarding quartz sand bioassay auxiliary control sample results from Pacific EcoRisk, CERC sent quartz sand and reference samples to ALS on January 7, 2021 and January 27, 2021, respectively, for total recoverable metals and TOC analysis. TAI continued evaluation of the auxiliary sand control sample results through the month, and conducted a call with EPA's technical team on March 16, 2021 for further discussion of the PER and CERC quartz sand control results. TAI received from EPA on March 31, 2021 a Data Validation Report for chemistry work CERC completed on the bioassay split samples provided to EPA.

Human Health Risk Assessment (HHRA) – TAI continued reviewing the Final HHRA received from EPA on February 11, 2021.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.